



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

March 2025 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

SALVADOR ALEXIS ACOSTA-ROSALES,
aka "Salvador Alexi Acosta
Rosales," and
DAVID ARNULFO SAENZ-ROSALES,

Defendants.

ED CR No. 5:25-cr-00230-SSS

I N D I C T M E N T

[18 U.S.C. § 659: Possession of
Goods Stolen from Interstate
Shipment; 8 U.S.C. § 1326(a):
Alien Found in the United States
Following Deportation; 18 U.S.C.
§ 981(a)(1)(C) and 28 U.S.C.
§ 2461: Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. §§ 659; 2(a)]

On or about June 25, 2025, in San Bernardino County, within the
Central District of California, defendants SALVADOR ALEXIS ACOSTA-
ROSALES, also known as "Salvador Alexi Acosta Rosales," and DAVID
ARNULFO SAENZ-ROSALES, aiding and abetting each other, knowingly had
in their possession goods and chattels of a value in excess of
\$1,000, that is, approximately 104 pairs of shoes valued at
approximately \$22,464, which had been embezzled and stolen from BNSF

1 train ZSBDWSP825A while moving in interstate commerce, knowing that
2 said goods and chattels had been embezzled and stolen.

COUNT TWO

[8 U.S.C. § 1326(a)]

On or about June 25, 2025, defendant SALVADOR ALEXIS ACOSTA-ROSALES, also known as "Salvador Alexi Acosta Rosales," an alien, who had been officially deported and removed from the United States on or about June 7, 2023, and on or about November 5, 2024, was found in San Bernardino County, within the Central District of California, after knowingly and voluntarily re-entering and remaining in the United States without having obtained permission from the Attorney General or her designated successor, the Secretary of Homeland Security, to reapply for admission to the United States following deportation and removal.

COUNT THREE

[8 U.S.C. § 1326(a)]

On or about June 25, 2025, defendant DAVID ARNULFO SAENZ-ROSALES, an alien, who had been officially deported and removed from the United States on or about March 19, 2018, and on or about November 6, 2024, was found in San Bernardino County, within the Central District of California, after knowingly and voluntarily re-entering and remaining in the United States without having obtained permission from the Attorney General or her designated successor, the Secretary of Homeland Security, to reapply for admission to the United States following deportation and removal.

FORFEITURE ALLEGATION

[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction of the offense set forth in Count One of this Indictment.

2. Any defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title and interest in any and all property, real or personal, constituting, or derived from, any proceeds traceable to any such offense; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), any defendant so convicted shall forfeit substitute property, up to the total value of the property described in the preceding paragraph if, as the result of any act or omission of the defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to or deposited with a third party; (c) has been

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1 placed beyond the jurisdiction of the court; (d) has been
2 substantially diminished in value; or (e) has been commingled with
3 other property that cannot be divided without difficulty.

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5 A TRUE BILL

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7 JS
8 Foreperson

9 BILAL A. ESSAYLI
10 United States Attorney

11 *Christina Shay*

12 CHRISTINA T. SHAY
13 Assistant United States Attorney
Chief, Criminal Division

14 PETER DAHLQUIST
15 Assistant United States Attorney
Chief, Riverside Branch Office

16 ERIN C. KISS
17 Assistant United States Attorney
Riverside Branch Office